

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**JAMES ZIMMERMAN, MARV  
PINZON, and WILLIAM G. VAZQUEZ,**

**Plaintiffs,**

**v.**

**ROBERT R. ROCHE, ASHFORD S.  
MCALLISTER, FRANK A. FERRARO,  
E. SCOTT PRETORIUS, QUANTUM  
MEDICAL RADIOLOGY, P.C., U.S.  
TELERADIOLOGY, L.L.C., U.S.  
MAMMO, L.L.C., NEUROSTAR  
SOLUTIONS, INC., NIGHTHAWK  
PHYSICIAN INVESTORS, LLC, and  
JOHN DOES 1 through 10,**

**Defendants.**

**Civil Action No.  
09-CV-0605-AT**

---

**QUANTUM MEDICAL RADIOLOGY,  
P.C.,**

**Counterclaim-Plaintiff,**

**v.**

**JAMES ZIMMERMAN, MARV  
PINZON, WILLIAM G. VAZQUEZ,  
JOSEPH CHRISTOPHER RUDÉ, III,  
and GEORGIA IMAGING  
ASSOCIATES, INC.,**

**Counterclaim-Defendants.**

---

**CERTIFICATE OF DISCOVERY**

COMES NOW David E. Spalten, counsel of record for Plaintiffs James Zimmerman, Marv Pinzon and William Vazquez, (collectively, “Plaintiffs”) and hereby certify that he has on this day served the following on counsel of record for Defendants and Counterclaim-Plaintiffs, by depositing a copy of the same in the United States mail, postage prepaid:

1. Plaintiffs’ Supplemental Responses and Objections to Defendants and Counter-Claim Plaintiffs’ First Interrogatories to Plaintiffs, and
2. Supplement to Plaintiffs’ Initial Disclosures.

This 15th day of December, 2011.

*(Signatures Continued On Following Page)*

KASOWITZ, BENSON, TORRES &  
FRIEDMAN, LLP

By: /s/ David E. Spalten

David E. Spalten

Georgia Bar No. 669010

Paul G. Williams

Georgia Bar No. 764925

Kelly S. Johnson

Georgia Bar No. 173474

One Midtown Plaza - Suite 1150

1360 Peachtree Street, N.E.

Atlanta, Georgia 30309

Telephone: 404-260-6080

Facsimile: 404-260-6081

*Attorneys for Plaintiffs  
and Counterclaim-Defendants*

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**JAMES ZIMMERMAN, MARV  
PINZON, and WILLIAM G. VAZQUEZ,**

**Plaintiffs,**

**v.**

**ROBERT R. ROCHE, ASHFORD S.  
MCALLISTER, FRANK A. FERRARO,  
E. SCOTT PRETORIUS, QUANTUM  
MEDICAL RADIOLOGY, P.C., U.S.  
TELERADIOLOGY, L.L.C., U.S.  
MAMMO, L.L.C., NEUROSTAR  
SOLUTIONS, INC., NIGHTHAWK  
PHYSICIAN INVESTORS, LLC, and  
JOHN DOES 1 through 10,**

**Defendants.**

---

**QUANTUM MEDICAL RADIOLOGY,  
P.C.,**

**Counterclaim-Plaintiff,**

**v.**

**JAMES ZIMMERMAN, MARV  
PINZON, WILLIAM G. VAZQUEZ,  
JOSEPH CHRISTOPHER RUDÉ, III,  
and GEORGIA IMAGING  
ASSOCIATES, INC.,**

**Counterclaim-Defendants.**

---

**Civil Action No.  
09-CV-0605-AT 1<sup>\*\*\*\*\*</sup>**

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing CERTIFICATE OF SERVICE OF DISCOVERY with the Clerk of Court using the CM/ECF system which will automatically send electronic notification of this filing to the following attorneys of record:

|  |  |
|--|--|
| Henry M. Perlowski<br>Edward A. Marshall<br>ARNALL GOLDEN GREGORY LLP<br>171 17th Street, N.W.<br>Suite 2100<br>Atlanta, Georgia 30363<br><br><i>Attorneys for Robert R. Roche, Ashford S. McAllister, Frank A. Ferraro, E. Scott Pretorius, Quantum Medical Radiology, P.C., U.S. Teleradiology, L.L.C., U.S. Mammo, L.L.C., and Nighthawk Physician Investors, LLC</i> | Arthur D. Brannan<br>Scott Lange<br>DLA PIPER LLP (US)<br>One Atlantic Center<br>1201 West Peachtree Street<br>Suite 2800<br>Atlanta, Georgia 30309-3450<br><br><i>Attorneys for Defendant Neurostar Solutions, Inc.</i> |
|--|--|

This 15th day of December, 2011.

/s/ David E. Spalten  
David E. Spalten  
Georgia Bar No. 669010